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NORTEL
NORTHERN TELECOM

May 5, 1998

Mr. Michael W. Mowery
Senior Counsel
AirTouch Communications, Inc.
2999 Oak Road MS 1025
Walnut Creek, California 94596

Dear Mr. Mowery:

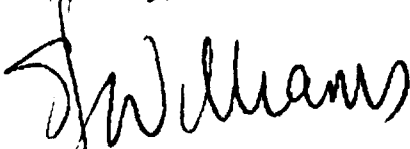
Northern Telecom Inc. ("Nortel") is a supplier of MTX telecommunications switching technology ("Technology") for AirTouch Communications, Inc. (AirTouch). In connection with the Communications Assistance for Law Enforcement Act ("CALEA"), AirTouch has requested that Nortel indicate whether Nortel will have available to AirTouch by October 25, 1998, Technology consisting of new systems and upgrades to AirTouch's existing Technology to provide wiretap assistance capability pursuant to Section 103(b) of CALEA in accordance with the current definition of that capability by law enforcement. For purposes of this statement, Nortel understands that law enforcement's current definition of such capability consists of the J-STD-025 standard adopted by Committee TR-45.2 of the Telecommunications Industry Association in December 1997 as supplemented by nine (9) additional features known as the "punch list" features, described in the Joint Petition for Expedited Rulemaking, filed by the Federal Bureau of Investigation ("FBI") and the U. S. Department of Justice with the Federal Communications Commission on March 27, 1998. This will confirm that, for several reasons, Nortel will not have such Technology available to AirTouch by October 25, 1998.

Notwithstanding the foregoing, Nortel intends to fully comply with its obligations under CALEA. Under Section 106(b) of CALEA, Nortel, as a manufacturer of the Technology, shall make available "...on a reasonably timely basis and at a reasonable charge..." to AirTouch such features or modifications as are necessary to comply with the assistance capability requirements and capacity requirements of CALEA.

Nortel, like other manufacturers, needs a reasonable time to develop solutions after a design target is identified in a standard and appropriate funding commitments have been made. To date, no stable design target is in place nor have any funding commitments been made. The "punch list" is not yet in a standard and J-STD-025 was only recently adopted in December 1997. Therefore, Nortel will not have had a reasonable time to develop Technology for AirTouch with the wiretap capability, as defined by law enforcement, for delivery by October 25, 1998. Generally, 24 to 36 months are needed to develop technology compatible with a given design target, once that target has been established. This typical development cycle could require more than two years after October 25, 1998, depending upon what additional requirements might be needed.

Nortel, like other manufacturers, would be risking tremendous resources, incurring lost opportunity costs and hindering the development of new services and technologies in attempting to develop CALEA compliant Technology without the guidance of a stable, definite design target. As a result of the competing petitions regarding the scope of the assistance capability requirements and other circumstances, no stable standard or design target exists. Adoption of a design attempting to meet the J-STD-025 and punch list features at this time represents a potentially significant waste of fiscal and personnel resources should the chosen design deviate from a future standard.

Sincerely,



E. John Williams
Vice President AirTouch Global Account Group
Nortel Wireless Networks

CERTIFICATE OF SERVICE

I, Gwendolyn Prothro, an attorney in the law firm of Steptoe & Johnson, LLP, hereby certify that I have on this May 5, 1998 caused to be served by first class mail, postage prepaid, or by hand delivery, a copy of the foregoing Petition to the following:

The Honorable William E. Kennard
Federal Communications Commission
1919 M Street, N.W. - Room 814
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The Honorable Harold Furchtgott-Roth
Federal Communications Commission
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The Honorable Susan Ness
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1919 M Street, N.W. - Room 832
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The Honorable Michael Powell
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The Honorable Gloria Tristani
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Gwendolyn Prothro